

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH E. SEITZ and : CHAPTER 13  
ANNE G. SEITZ :  
Debtor(s) :  
: CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
: vs. :  
: JOSEPH E. SEITZ and :  
ANNE G. SEITZ :  
Respondent(s) : CASE NO. 1-18-bk-02031

TRUSTEE'S OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

AND NOW, this 16th day of October, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. Plan ambiguous – Debtors' plan fails to provide amounts to be paid to IRS and Revenue relative to their secured and priority claims.
  - b. Debtors' plan provides for non-exempt equity to be paid to IRS and Revenue but claim \$0 liquidation value. (Paragraph 1B)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day of October, 2019 I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Lawrence Young, Esquire  
135 North George Street  
York, PA 17401

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee